

**United States District Court
Southern District Of New York**

Melinda Serin, Judson Russ, Long Soui Lim,
Peri Kettler, Gordon Redner, and Thomas J. Smith,
Plaintiffs

v.

Northern Leasing Systems, Inc., Jay Cohen,
Rich Hahn, and Sara Krieger
Defendants

06-Civ-1625
(Hon. Gwin, J.)

**PLAINTIFFS' AMENDED
DISCLOSURES UNDER
RULE 26, FED.R.CIV.P.**

1. Rule 26(a)(1)(A)(I) (“ the name and, if known, the address and telephone number of each individual likely to have discoverable information — along with the subjects of that information — that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment”):
 - a. Ms. Melinda Serin, 429 N Street SW, Apt. 501, Washington, DC 20024. The subject of discoverable information from Ms. Serin is facts asserted in the amended Complaint.
 - b. Mr. Judson Russ, 14818 Via Winghurst Court, Orlando, FL 32828. The subject of discoverable information from Mr. Russ is facts asserted in the amended Complaint.
 - c. Mr. Long Soui Lim, 1135 Onyx Way, Big Bear City, CA 92314. The subject of discoverable in formation from Mr. Lim is facts asserted in the amended Complaint.
 - d. Ms. Peri Kettler, 13502 Airport Cutoff Road, Port Townsend, WA 98368-9320.

The subject of discoverable information from Ms. Kettler is facts asserted in the amended Complaint.

- e. Ms. Gordon Redner, 322 Linklea Dr., Duncanville, TX 75137. The subject of discoverable information from Mr. Redner is facts asserted in the amended Complaint.
- f. Mr. Thomas J. Smith, N24 W22248 Ridgewood Court, Waukesha Wisconsin 53186. The subject of discoverable information from Mr. Redner is facts asserted in the amended Complaint.
- g. Steven Turner, The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- h. Raymond Simon, 5563 Nanday Court, Oceanside, CA 92057-1915. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- i. Jaya Patel, 2440 Northside Parkway NW, Atlanta, GA 30327. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with

respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.

- j. Natalia Russ, 14818 Via Winghurst Court, Orlando, FL 32828. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- k. Gus Gagasoules, 101 Hillside Ln., Syosset, NY 11791. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- l. Rhonda Garner, 24906 W. Red Robin Dr., Wittmann, AZ 85361. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- m. Michael Han, 2131 Pililani Place, Honolulu, HI 96822. The subject of

discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.

- n. Thomas Barnes, 2355 W. Shinnecock Ct, Anthem, AZ 85086. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- o. Lewis Bae, 2300 Zanker Road, Unit F, San Jose, CA 95131. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- p. Jonathan Raubach, 4670 Santa Fe Street, San Diego, CA 92109. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City

Civil Court, including fraudulent default judgments.

- q. Michael Coleman, 4949 Cornerville Way, Lynnville, TN 38472. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- r. Linda Zeigler, 1200 Orchard Hill Road, Mount Pleasant Mil, PA 17853. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- s. Rock Lee, 3521 Newton Street, Torrance, CA 90505. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- t. Coleman Matthew, 1040 Polk Street, San Francisco, CA 94109. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with

respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.

- u. Barbara McMurrey, 8202 Summerleaf Dr., Arlington, Texas 76001. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- v. Abuqalbeen, Ali, 111 Cottonwood Circle Lynn Haven, FL 32444. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- w. Ahmed, Nessar, 457 Greynold Circle Lantana, FL 33462. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- x. Ahumada, Vincente, 740 N. Calaveras Ave, Ontario, CA 91764. The subject of

discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.

- y. Alberico, Harold, 19 Bennet Avenue Skowhegan, ME 04976. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- z. Azar, Simon, 3590 Crestmoor Dr San Bruno, CA 94066. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- aa. Basham, Mark, 12521 N.E. 152nd Avenue, Brush Prairie, WA 98606. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City

Civil Court, including fraudulent default judgments.

- bb. Biderman, Karen, 3351 S. Albion Street Denver, CO 80222. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- cc. Bratcher, Tim, 216 North 5th Street, Lott, TX 76656. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- dd. Broussard, James, 604 Via Promontorio, San Clemente, CA 92672. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- ee. Bruce, Kevin, 1006 W University Dr Gainesville, TX 76240. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with

respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.

- ff. Chong, Lavinia, 1720 Port Stirling Pl Newport, CA 92660. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- gg. Cisneros, Oscar, 15316 North East 140th Street Redmond, WA 98052-2033. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- hh. Dreier, Sherl, 10256 Northfield Rd. Northfield, OH 44067. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- ii. Fortney, John, 8981 La Linia Unit I Atascadero, CA 93422. The subject of

discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.

jj. Fukushima, Yuji, 377 Rector Place, New York, NY 10280. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.

kk. Gompert, Cynthia, 319 South Pitt Street Alexandria, VA 22314. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.

ll. Grin, Jarnail, 4717 Laguna Park Dv Elk Grove, CA 95758. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City

Civil Court, including fraudulent default judgments.

- mm. Haag, Robert, 711 NW Lynwood Pl. Grants Pass, OR 97526. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- nn. Jenkins, Deron, 210 East Utica Avenue Huntington Beach, CA 92648. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- oo. Le, Minh, 10225 55 S Avenue Seattle, WA 98178. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- pp. Lebreton, Jean Louis, 42A Melrose Ave Norwalk, CT 06855. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with

respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.

- qq. Mahdavi, Mitra, 100 Potomac Lane, Daytona Beach, FL 32119 . The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- rr. McMullin, David, 745 Shrewsbury Avenue, Shrewsbury, NJ 07702. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- ss. Meza, Cynthia, 1201 Tacoma Drive, Dalton, GA 30720. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- tt. Mohsin, Fadhle, 5592 Avenue 400, Dinuba, CA 90505. The subject of

discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.

- uu. Mumolo, Anthony, 1076 E. First Street, Suite E, Tustin, CA 92780. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- vv. Patel, Kalavati, 1725 W Lake Mary Blvd, Lake Mary, FL 32746. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- ww. Patel, Raghunan, 250 Westford Rd., Tyngsborough, MA 01879. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City

Civil Court, including fraudulent default judgments.

- xx. Pivnick, Charles, 746 29th Avenue San Francisco, CA 94121. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- yy. Radley, Charles, 8930 Hartshorn Road, Corfu, NY 14038. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- zz. Reitz, Darlene, 864 Lakeview Ln., Twin Peaks, CA 92391. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- aaa. Sisco, Jim, 151 W. Lemon Ave Eustis, FL 32726. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims

under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.

- bbb. Thomas, Angela, 7751 New Bedford Avenue Cincinnati, OH 45237. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- ccc. Villa, Lucia, 2710 Rock Island Road, East Wenatchee, WA 98802. The subject of discoverable information from the witness are: defendants fraudulent scheme, wrongful entries to credit reports, assertions in the amended Complaint with respect to claims under the federal racketeering statute and New York's Anti-Deceptive Trade Practices Act, and small claims proceedings in the NY City Civil Court, including fraudulent default judgments.
- ddd. Defendant's employees, including without limitation Jay Cohen; Rich Hahn; Sara Krieger; Lina Kravic; Sam Buono. The addresses and telephone numbers of all these persons are known to Defendant. Defendant's employees would have discoverable information about the facts asserted in the Amended Complaint.
- eee. Plaintiff reserves the right to supplement this response if appropriate.

- 2. Rule 26(a)(1)(A)(ii) ("a copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party

has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment”):

- a. Communication between Plaintiffs and Defendant Northern Leasing Systems, Inc., and/or its employees;
 - b. Legal proceedings commenced by Defendant, including pleadings, court filings and related documents;
 - c. Communication between Plaintiffs and Defendant’s agents/representatives;
 - d. Plaintiff reserves the right to supplement this response if appropriate.
3. Rule 26(a)(1)(A)(iii) (“a computation of each category of damages claimed by the disclosing party — who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered”)
- a. Compensation for injuries inflicted, including transportation and conveyance expenses, boarding and lodging expenses, emotional distress, annoyance, inconvenience, and all damages compensable under the law;
 - b. Compensation for injuries inflicted by Defendants’ adverse entries in Plaintiffs’ individual credit reports;
 - c. Plaintiffs reserve the right to supplement this response if appropriate.
4. Rule 26(a)(1)(A)(iv) (“for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy

the judgment”)

Not applicable.

Dated: New York, New York
September 13, 2010

Chittur & Associates, P.C.

Sd/

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